

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**GE Industrial Systems, Inc.  
1412 13th Street  
Tell City, Indiana 47586**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

|                                                                                                         |                                                                |
|---------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| Operation Permit No.: F123-6903-00006                                                                   |                                                                |
| Issued by: Original Signed by Paul Dubenetzky<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: May 8, 2002<br><br>Expiration Date: May 8, 2007 |

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary electric motor manufacturing plant.

Authorized Individual: Plant Manager  
Source Address: 1412 13th Street, Tell City, Indiana, 47586  
Mailing Address: 1412 13th Street, Tell City, Indiana, 47586  
SIC Code: 3621  
Source Location Status: Perry  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) surface coating operations:
  - (1) One (1) Electrocoat dip tank, identified as Unit 01, installed in 1981, with a maximum capacity of nine-hundred and twenty (920) ft<sup>2</sup>/hr of parts, exhausting to stacks P72, P73, P74, and P75.
  - (2) One (1) 29 Frame varnish dip system, identified as Unit 02, installed in 1967, with a maximum capacity of six-hundred and eighty-six (686) units per hour, exhausting to stacks P28, P29, P30 and P31.
  - (3) One (1) Tybond wash and phosphatizing spray system, identified as Unit 03, installed in 1971, with a maximum capacity of one-thousand three-hundred and forty-two (1,342) units per hour, exhausting to stacks P5, P6 and P7.
- (b) Two (2) Crystal Clean degreasers, identified as F10 and F11, with a maximum usage rate of 1.7 pounds per hour solvent each, installed in 1998.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (b) VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.

- (e) Equipment related to manufacturing activities not resulting in the emission of HAPs, such as brazing equipment, cutting torches, soldering equipment, welding equipment.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (h) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (i) Quenching operations used with heat treating processes.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Asbestos abatement projects regulated by 326 IAC 14-10.
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (o) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.
- (p) On-site fire and emergency response training approved by the department.
- (q) Emergency generators: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (r) Stationary fire pumps.
- (s) Grinding and machining operations with fabric filters, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (t) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (u) Units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP: Rotor Blue manual protective coating process, exhausting internally.
- (v) Units emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of a single HAP: One (1) 29 Frame Motor Shell touch-up paint spray booth, using spray cans, exhausting to stack P15.
- (w) Two (2) die casting machines with a total maximum throughput of 44 pounds per hour aluminum and 0.3 pounds per hour of die release lubricant, each machine utilizing a natural gas-fired furnace at 0.3 MMBtu per hour each to melt aluminum, with the casting machines venting through stacks P3, P3A, P4, and P4A.

- (x) One (1) Wellman electrically heated annealing oven, and an exalene generator rated at 0.78 MMBtu per hour, with emissions released during the oven door opening cycle. Emissions released after opening exhaust through roof openings GV1, GV2, P51A, P51B, and P52.
- (y) One (1) natural gas-fired pyrolysis oven, rated at 0.3 MMBtu per hour, exhausting at stack P11.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)][326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;



- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance performed under the Preventive Maintenance Plans, including the plans themselves, shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Southwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

or

Telephone No.: 1-888-672-8323, or 317-436-2570  
Facsimile No.: 317-436-2572

Failure to notify IDEM, OAQ and the Southwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) **Emission Trades** [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) **Alternative Operating Scenarios** [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement** [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry** [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control** [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the

"authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

|               |
|---------------|
| Entire Source |
|---------------|

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.



**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

**Testing Requirements [326 IAC 2-8-4(3)]**

**C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated upon permit issuance, the Permittee may extend the compliance schedule related to the equipment for thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the thirty (30) day public notice with full justification of the reasons for the inability to implement compliance monitoring upon permit issuance.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins, unless otherwise specified in the approval for the new emissions unit.

##### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

#### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40

CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from, or violation of, this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable response steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B- Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken pursuant to Section D. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

**Stratospheric Ozone Protection**

**C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

(a) Three (3) surface coating operations:

- (1) One (1) Electrocoat dip tank, identified as Unit 01, installed in 1981, with a maximum capacity of nine-hundred and twenty (920) ft<sup>2</sup>/hr of parts, exhausting to stacks P72, P73, P74, and P75.
- (2) One (1) 29 Frame varnish dip system, identified as Unit 02, installed in 1967, with a maximum capacity of six-hundred and eighty-six (686) units per hour, exhausting to stacks P28, P29, P30 and P31.
- (3) One (1) Tybond wash and phosphatizing spray system, identified as Unit 03, installed in 1971, with a maximum capacity of one-thousand three-hundred and forty-two (1,342) units per hour, exhausting to stacks P5, P6 and P7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from Unit 03 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4]

The volatile organic compounds (VOCs) used by Units 01, 02 and 03 shall not exceed ninety (90) tons per twelve (12) consecutive month period. This limit, in conjunction with the VOC limits of the other units at the source, will limit the entire source VOC emissions to less than one hundred (100) tons per year making the requirements of 326 IAC 2-7 not applicable.

#### D.1.3 Volatile Organic Compounds (VOC) Limit [326 IAC 8-2-9]

The VOC emissions from Unit 01 shall be limited to less than twenty-five (25) tons per year making the requirements of 326 IAC 8-2-9 (Surface coating emission limitations: miscellaneous metal coating operations) not applicable.

#### D.1.4 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8-4]

- (a) An individual HAP used by Units 01 and 02 shall not exceed nine (9) tons per twelve (12) consecutive month period.
- (b) The combination of HAPs used by Units 01 and 02 shall not exceed twenty-three (23) tons per twelve (12) consecutive month period.

These limits, in conjunction with the HAPs from the insignificant units at the source, will limit the entire source HAP emissions to less than ten (10) tons per year for a single HAP, and less than twenty-five (25) tons per year for a combination of HAPs, making the requirements of 326 IAC 2-7 not applicable.

### Compliance Determination Requirements

#### D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the

coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **D.1.6 VOC and HAP Emissions**

Compliance with Conditions D.1.2, D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.1.7 Monitoring**

- (a) Weekly observations shall be made of the overspray from the surface coating booth stacks ( P5, P6, P7) while Unit 03 is in operation. Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.8 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.2, D.1.3 and D.1.4.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).



## SECTION D.2

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) Two (2) Crystal Clean degreasers, identified as F10 and F11, with a maximum usage rate of 1.7 pounds per hour solvent each, installed in 1998.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4]

The volatile organic compounds (VOCs) content usage for units F10 and F11 shall not exceed 5.0 tons per twelve (12) consecutive month period. This limit, in conjunction with the VOC limits of the other units at the source, will limit the entire source VOC emissions to less than one hundred (100) tons per year making the requirements of 326 IAC 2-7 not applicable.

#### D.2.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility (F10 and F11) construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### **Compliance Determination Requirements**

#### **D.2.3 VOC Emissions**

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.2.4 Record Keeping Requirement**

- (a) To document compliance with Conditions 2.1 and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
  - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAP usage for each day month; and
  - (5) The weight of VOC and HAP emitted for each compliance period.
- (b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

#### **D.2.5 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations with fabric filters, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) Equipment related to manufacturing activities not resulting in the emission of HAPs, such as brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Rotor Blue manual protective coating process, exhausting internally.
- (d) One (1) 29 Frame Motor Shell touch-up paint spray booth, using spray cans, exhausting to stack P15.
- (e) Two (2) die casting machines with a total maximum throughput of 44 pounds per hour aluminum and 0.3 pounds per hour of die release lubricant, each machine utilizing a natural gas-fired furnace rated at 0.3 MMBtu per hour each to melt aluminum, with the casting machines venting through stacks P3, P3A, P4, and P4A.
- (f) One (1) Wellman electrically heated annealing oven, and an exalene generator rated at 0.78 MMBtu per hour, with emissions released during the oven door opening cycle. Emissions released after opening exhaust through roof openings GV1, GV2, P51A, P51B, and P52.
- (g) One (1) natural gas-fired pyrolysis oven, rated at 0.3 MMBtu per hour, exhausting at stack P11.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining operations and manufacturing activities such as brazing equipment, cutting torches, soldering equipment, and welding equipment, the Frame touch-up manual spray booth, and the Die casting process shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.3.2 Volatile Organic Compounds (VOC)

Pursuant to Exemption 123-3554-00006, issued March 21, 1994, any change or modification which may increase the potential to emissions to fifteen (15) pounds of volatile organic compounds per day or more from the 29 Frame Motor Shell touch-up paint spray booth, must be approved by the Office of Air Quality before such a change may occur.

### Compliance Determination Requirement

#### D.3.3 Particulate Matter (PM)

The fabric filters for particulate matter control shall be in operation and control emissions from the Grinding and Machining processes at all times these processes are in operation.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

## OFFICE OF AIR QUALITY

### COMPLIANCE DATA SECTION

#### FESOP Quarterly Report

Source Name: GE Industrial Systems, Inc.  
 Source Address: 1412 13th Street, Tell City, Indiana 47586  
 Mailing Address: 1412 13th Street, Tell City, Indiana 47586  
 FESOP No.: 123-6903-00006  
 Facility: Units 01, 02, 03, F10 and F11  
 Parameter: VOCs  
 Limit: 01, 02, and 03; less than 90.0 tons per twelve consecutive month period  
 F10 and F11; less than 5.0 tons per twelve consecutive month period

YEAR: \_\_\_\_\_

| Units 01, 02, 03 | VOC (tons) | VOC (tons)         | VOC (tons)     |
|------------------|------------|--------------------|----------------|
|                  | This Month | Previous 11 Months | 12 Month Total |
| Month 1          |            |                    |                |
| Month 2          |            |                    |                |
| Month 3          |            |                    |                |

| Units F10, F11 | VOC (tons) | VOC (tons)         | VOC (tons)     |
|----------------|------------|--------------------|----------------|
|                | This Month | Previous 11 Months | 12 Month Total |
| Month 1        |            |                    |                |
| Month 2        |            |                    |                |
| Month 3        |            |                    |                |

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: GE Industrial Systems, Inc.  
Source Address: 1412 13th Street, Tell City, Indiana 47586  
Mailing Address: 1412 13th Street, Tell City, Indiana 47586  
FESOP No.: 123-6903-00006  
Facility: Units 01 and 02  
Parameter: HAPs- single and combination  
Limit: single less than 9.0 tons per twelve consecutive month period  
combination less than 23.0 tons per twelve consecutive month period

YEAR: \_\_\_\_\_

| Month   | Single HAP (tons) | Single HAP (tons)  | Single HAP (tons) |
|---------|-------------------|--------------------|-------------------|
|         | This Month        | Previous 11 Months | 12 Month Total    |
| Month 1 |                   |                    |                   |
| Month 2 |                   |                    |                   |
| Month 3 |                   |                    |                   |

| Month   | Combination HAPs (tons) | Combination HAPs (tons) | Combination HAPs (tons) |
|---------|-------------------------|-------------------------|-------------------------|
|         | This Month              | Previous 11 Months      | 12 Month Total          |
| Month 1 |                         |                         |                         |
| Month 2 |                         |                         |                         |
| Month 3 |                         |                         |                         |

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: GE Industrial Systems, Inc.  
Source Address: 1412 13th Street, Tell City, Indiana 47586  
Mailing Address: 1412 13th Street, Tell City, Indiana 47586  
FESOP No.: 123-6903-00006

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) \_\_\_\_\_
- ☐ Report (specify) \_\_\_\_\_
- ☐ Notification (specify) \_\_\_\_\_
- ☐ Affidavit (specify) \_\_\_\_\_
- ☐ Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: GE Industrial Systems, Inc.  
Source Address: 1412 13th Street, Tell City, Indiana 47586  
Mailing Address: 1412 13th Street, Tell City, Indiana 47586  
FESOP No.: 123-6903-00006

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

|                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Date/Time Emergency started:                                                                                                                                                                                                                                              |
| Date/Time Emergency was corrected:                                                                                                                                                                                                                                        |
| Was the facility being properly operated at the time of the emergency?    Y    N<br>Describe:                                                                                                                                                                             |
| Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:                                                                                                                                                                           |
| Estimated amount of pollutant(s) emitted during emergency:                                                                                                                                                                                                                |
| Describe the steps taken to mitigate the problem:                                                                                                                                                                                                                         |
| Describe the corrective actions/response steps taken:                                                                                                                                                                                                                     |
| Describe the measures taken to minimize emissions:                                                                                                                                                                                                                        |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: GE Industrial Systems, Inc.  
Source Address: 1412 13th Street, Tell City, Indiana 47586  
Mailing Address: 1412 13th Street, Tell City, Indiana 47586  
FESOP No.: 123-6903-00006

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

|                                                        |                               |
|--------------------------------------------------------|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

  

|                                                        |                               |
|--------------------------------------------------------|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

  

|                                                        |                               |
|--------------------------------------------------------|-------------------------------|
| <b>Permit Requirement</b> (specify permit condition #) |                               |
| <b>Date of Deviation:</b>                              | <b>Duration of Deviation:</b> |
| <b>Number of Deviations:</b>                           |                               |
| <b>Probable Cause of Deviation:</b>                    |                               |
| <b>Response Steps Taken:</b>                           |                               |

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP)

**Source Name:** GE Industrial Systems  
**Source Location:** 1412 13<sup>th</sup> Street, Tell City, Indiana 47586  
**County:** Perry  
**SIC Code:** 3621  
**Operation Permit No.:** F123-6903-00006

On February 14, 2002, the Office of Air Quality (OAQ) had a notice published in the Perry County News, Tell City, Indiana, stating that GE Industrial Systems had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary electric motor manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

There were no comments received from the public, or other parties, regarding this proposed permit. On March 14, 2002, GE Industrial Systems submitted comments on the proposed FESOP. Their comments are as follows:

### **Comment 1:**

*Condition A.2 -- Emission Units and Pollution Control Equipment Summary:* The description of the Tybond system in subparagraph (a)(3) should be revised as follows:

One (1) Tybond wash and phosphatizing spray system, identified as Unit 03, installed in 1971, with a maximum capacity of one-thousand three-hundred and forty-two (1,342) units per hour, exhausting to stacks P5, P6 and P7.

### **Response to Comment 1:**

The description for Unit 03 above appears as it is in the permit draft copy that was on public notice. The IDEM has checked the draft hard copy in house, the hard copies sent to the library, and the electronic copy placed on the IDEM website which all have the above description. Therefore, no change is necessary.

### **Comment 2:**

*Condition B.8 -- Duty to Supplement:* Subsection (a) of this provision should be deleted because the "duty to supplement" applies only until a draft permit is issued. Under 326 IAC 2-8-3(f), the requirement to supplement the application is relevant only while that application is pending, not after the permit is issued:

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a FESOP application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. An applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date the applicant filed a complete application but prior to release of a draft FESOP. In addition, the applicant shall provide additional information as requested by the commissioner to determine the compliance status of the source in accordance with section 5(a) of this rule.

The standard permit conditions and other permit content requirements, including compliance requirements, are found in 326 IAC 2-8-4 and 2-8-5, neither of which imposes a requirement to supplement the application after issuance of the permit. If such a requirement were intended, it would have been explicitly included in these sections.

The duty to supplement the application, therefore, does not apply after issuance of the permit. This makes sense because, after issuance of the permit, the requirement to revise the permit to include applicable requirements as appropriate governs all future submittals of information.

While GEIS maintains that this provision should be deleted in its entirety, if IDEM does not remove this provision, GEIS will interpret it to require a supplement only when changed or omitted information would result in a requirement being applicable to the facility that was not identified in the permit. If there would be no effect on applicable requirements, GEIS interprets that the information would not be "relevant" and would therefore not need to be reported. If IDEM does not address this issue when it issues the permit, GEIS will be basing its compliance certifications and actions to comply with the permit on this interpretation.

#### **Response to Comment 2:**

326 IAC 2-8-4(5)(E), and its corresponding permit condition, requires the Permittee to submit information only at the request of the department. 326 IAC 2-8-3(f) requires the applicant, upon becoming aware that the application contained incorrect information, to submit corrected information. While the OAQ agrees that this subsection does limit the obligation of the applicant regarding new applicable requirements to the time prior to the release of a draft permit, it does not contain language limiting the obligation to corrected information.

#### **Comment 3:**

*Condition B.13 – Preventive Maintenance Plan:* Subsection (d) should be revised to clarify that the records of preventive maintenance to be retained refer to the preventive maintenance that is conducted pursuant to a preventive maintenance plan, rather than other preventive maintenance the facility might conduct. We interpret the provision as being limited in this manner but it would be helpful for IDEM to clarify the language appropriately. If IDEM does not address this issue when it issues the permit, GEIS will be basing its compliance certifications and actions to comply with the permit on this interpretation.

#### **Response to Comment 3:**

The Permittee is required to keep records of the preventive maintenance conducted as well as the PMPs themselves. Since the Permittee wishes for more clarification on this, the first sentence of part (d) now reads as:

Records of preventive maintenance **performed under the Preventive Maintenance Plans, including the plans themselves**, shall be retained for a period of at least five (5) years.

#### **Comment 4:**

*Condition B.21 – Inspection and Entry:* Subsection (e) should be deleted because it is not among the authorities listed in 326 IAC 2-8-5.

#### **Response to Comment 4:**

The IDEM disagrees. The means of assuring compliance with this permit, as listed in part (e), are routine, as they have been in the past, and are performed to document conditions during an inspection. Therefore, part (e) of this condition is, without doubt, an extension of the requirements of 326 IAC 2-8-5(a)(2)(C). The use of cameras or other recording, testing, or monitoring equipment for the purpose of assuring compliance with this permit, if necessary, is reasonable. This subsection acknowledges the right of the source to claim such information is confidential. There has been no change to this condition as a result.

#### **Comment 5:**

*Condition C.10 – Compliance Monitoring:* This provision states that all compliance monitoring and recordkeeping not already legally required should be implemented upon permit issuance unless otherwise specified in the permit. Condition C.16 specifies that recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. Accordingly, we interpret Condition C.16 as providing the facility with 90 days after the permit is issued to implement the new recordkeeping requirements, rendering the deadline of permit issuance in Condition C.10 inapplicable. Of course, compliance monitoring that is not recordkeeping will be implemented upon permit issuance as provided in Condition C.10.

### Response to Comment 5:

In an apparent oversight, condition C.10 states that the source shall implement all monitoring and record keeping requirements upon issuance of this permit. However, this conflicts with C.16(b) which states that record keeping requirements shall be implemented within ninety days of permit issuance. The first sentence of condition C.10 was initially written based on the fact that the source will not be adding control equipment (which traditionally can take months) to their operations as a term of the permit. However, since there are new record keeping requirements imposed by this permit, the first sentence of condition C.10 will be changed as follows:

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented ~~upon~~ **within ninety (90) days of** permit issuance.

### Comment 6:

*Condition C.13 – Compliance Response Plan – Failure to Take Response Steps:* This provision has largely been revised to reflect IDEM's new model language with the exception of the following changes which are contained in the model language but are not found in this draft permit:

- C.13 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
    - (b)(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from, or a violation of, this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (e) The Permittee shall record all instances when response steps are taken pursuant to Section D. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

We previously made these comments on the January 15, 2002 draft version of the permit. IDEM issued a new version of its model permit on January 17, 2002. Unfortunately, IDEM has not made the revisions in this new draft of our permit to reflect the new model language. These changes should be made before the permit is issued. We have attached the January 17, 2002 version of the model language for your reference.

### Response to Comment 6:

The IDEM agrees that these revisions can be made accordingly because they do not change the intent of the condition. Also note that the condition title in the above comment is not the correct title. The public notice copy of the draft permit is correct with regards to the title of this condition. The affected condition parts now read as:

- (b)(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from, **or a violation of**, this permit so long as the Permittee documents such response steps in accordance with this condition.
- (e) The Permittee shall record all instances when response steps are taken **pursuant to Section D**. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

### Comment 7:

*Section D.1 Facility Description:* The description of the Tybond system in subparagraph (a)(3) should be revised as follows:

One (1) Tybond wash and phosphatizing spray system, identified as Unit 03, installed in 1971, with a maximum capacity of one-thousand three-hundred and forty-two (1,342) units per hour, exhausting to stacks P5, P6 and P7.

Note that there are no controls on this unit.

**Response to Comment 7:**

Please see the Response to Comment 1.

**Comment 8:**

*Condition D.1.2 and D.1.4:* The reference to “delivering” pollutants to the units should be changed to refer to emissions from the units because pollutants are not delivered to the units. Rather, they are contained in materials used by the units and emitted during the process. An alternative approach would be to state:

The volatile organic compounds (VOCs) emitted from Units 01, 02, and 03 shall not exceed ninety (90) tons per twelve (12) consecutive month period.

No individual HAP emitted from Units 01 and 02 shall exceed nine (9) tons per twelve (12) consecutive month period.

Units 01 and 02 shall not emit more than twenty-three (23) tons per twelve (12) consecutive month period for any combination of HAPs.

**Response to Comment 8:**

The IDEM disagrees with the alternative approach suggested above. The IDEM uses the phrase “delivered to” because the VOC emissions from this process are determined by the content in the coating and the usage. For applicability purposes, the IDEM assumes 100% VOC from any coating and/or solvent used is emitted upon being delivered to the process unit as the Permittee has also stated below in the third sentence of Comment 9. Since the source must demonstrate compliance by coating usage, and as a compromise, these conditions have been revised. The first sentence of D.1.2 now reads as:

The volatile organic compounds (VOCs) ~~delivered to~~ **used by** Units 01, 02, and 03 shall not exceed ninety (90) tons per twelve (12) consecutive month period.

D.1.4 (a) and (b) now read as:

- (a) No individual HAP ~~delivered to~~ **used by** Units 01 and 02 shall exceed nine (9) tons per twelve (12) consecutive month period.
- (b) The combination of HAPs ~~delivered to~~ **used by** Units 01 and 02 shall not exceed more than twenty-three (23) tons per twelve (12) consecutive month period for any combination of HAPs.

**Comment 9:**

*Condition D.1.5 – Preventive Maintenance Plan:* There is a requirement for a preventive maintenance plan for this unit. The PMP is not needed for this unit for the following reasons. First, we have assumed that 100% of the VOC that is delivered to the unit is emitted as VOC. Therefore, there is no preventive maintenance that could prevent an exceedence since we are already assuming a worst-case scenario.

Second, the burners we are utilizing are not low NOx burners, so there isn't preventive maintenance that would affect emissions from the burners. The only other scenario where additional emissions could occur is if the flame went out, and in that situation natural gas supply is automatically shutdown by a solenoid valve. Therefore, there is nothing to include in the preventive maintenance plan for this unit.

Accordingly, the PMP would not contain any steps related to air emissions. Because the PMP authority is limited, ..... related to air emissions, the PMP requirement is not relevant to this unit, regardless of whether it pertains to process, combustion or control equipment.

**Response to Comment 9:**

Pursuant to 326 IAC 2-8-3(c)(6) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-8-4(9) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- 1) Maintain on-site the preventive maintenance plan as required by 326 IAC 2-8-3(c)(6);
- 2) Implement the preventive maintenance plan; and,
- 3) Forward to the department upon request the preventive maintenance plan.

By this authority, this condition was put in the draft permit that was on public notice. However, since the equipment of this section does not have any pollution control equipment associated with it, and the Permittee is required to demonstrate compliance by record keeping of VOC and HAP usage, this condition has been deleted. It read as:

~~A Preventive Maintenance Plan, in accordance with Section B Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.~~

All other subsequent conditions have been renumbered as a result of this deletion and the Table of Contents has also been changed.

#### Comment 10:

*Condition D.1.8 – Monitoring:* Because there are no controls for this unit, subsection (a) should be deleted. The overspray concept is only relevant when one is using particulate control. The observation for overspray is an indicator of whether controls are operating properly. Because there are no controls on this unit, monitoring overspray is not necessary. Moreover, only the Tybond operation uses a spray process and the likelihood of *any* spray from the process is extremely limited. Subsection (c) should also be deleted because the PMP requirement should be eliminated as discussed above.

Please note that the corresponding provisions in D.1.10(b) should also be deleted.

Finally, we note that even if this were a proper condition, the language regarding the Compliance Response Plan has been changed in the latest version of IDEM's model permit language. Compliance with the CRP is not required. Instead compliance with Section C is required. Under Section C, the facility is required to either follow the CRP or take other reasonable response steps when the CRP is not applicable or responsive to the situation at hand. Requiring compliance with the CRP is an issue that was specifically discussed and rejected by IDEM in the development of the model language because IDEM wanted to ensure that reasonable response steps would be taken and recognized that reasonable response steps for a given situation may well differ from the steps that were anticipated when the CRP was originally drafted. This change for coating operations was overlooked in the January 17, 2002 version of the model permit even though it was changed for all of the other examples in the model. When this oversight was brought to the attention of Stacey Pfeffer and Polly Hite of IDEM by our counsel Shannon Broome, they indicated that this was an error and that the model language would be revised. They also indicated that before the revision is complete, anyone who raises this comment will be directed to change the permit language as we recommend below. GE requests that the permit engineer contact Ms. Hite and Pfeffer and correct this permit condition. We have attached the correspondence with IDEM regarding this language for your reference.

#### D.1.8 Monitoring

- (a) Weekly observations shall be made of the overspray from the surface coating booth stacks (P5, P6, P7) while Unit 03 is in operation. **Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports** ~~The Compliance Response Plan~~ shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. **Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports** ~~The Compliance Response Plan~~ shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

### Response to Comment 10:

The IDEM believes that part (a) is appropriate. While the source feels that overspray monitoring should only be required for units with particulate matter control, the IDEM feels it is just as important for those units without controls. Unusual overspray, regardless of having air pollution controls or not, may indicate problems with the unit, and proper adjustments may be required as a result. Since the source is not required at this time to test Unit 03 for particulate matter to show compliance with 326 IAC 6-3, the IDEM believes it is fair to require this monitoring. If the source prefers to stack test to show compliance with this rule, they may submit the results for review in this matter. Please refer to the Response to Comment 9 regarding part (c).

The IDEM has not made the statement that "Compliance with the CRP is not required". In previous discussions with the applicant, the IDEM clarified that reasonable response steps listed in the CRP shall be taken according to the steps listed in the Permittee's current CRP. If these steps do not resolve the situation, or are not responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. The CRP condition stated in Section C of the permit is the basis for the requirements of Section D which are more detailed with regards to frequency and methods of monitoring based in the units and processes of that section.

The IDEM had intended to make the above language change to condition D.1.8, now D.1.7, prior to public notice because it does not affect the intent of the condition. Because of this prior intention, it has now been changed as requested. In the comment above, the Permittee has shown the revisions. For clarification the final unmarked version of this sentence reads as:

Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be followed whenever a condition exists which should result in a response step.

### Comment 11:

*Section D.3 – Facility Description:* Subsection (a) should be changed to reflect the entire language of Item 45 on Form GSD-10(a) – Insignificant Activities to prevent confusion:

Grinding and machining operations with fabric filters, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

### Response to Comment 11:

The IDEM agrees and has changed part (a) to read as:

Grinding and machining operations ~~controlled~~ with fabric filters, **mist collectors, wet collectors, and electrostatic precipitators** with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, **including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.**



**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit (FESOP)

**Source Background and Description**

**Source Name:** GE Industrial Systems, Inc.  
**Source Location:** 1412 13th Street, Tell City, Indiana 47586  
**County:** Perry  
**SIC Code:** 3621  
**Operation Permit No.:** F123-6903-00006  
**Permit Reviewer:** Melissa Groch

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from GE Industrial Systems, Inc., relating to the operation of an electric motors manufacturing plant.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Three (3) surface coating operations:
  - (1) One (1) Electrocoat dip tank, identified as Unit 01, installed in 1981, with a maximum capacity of nine-hundred and twenty (920) ft<sup>2</sup>/hr of parts, exhausting to stacks P72, P73, P74, and P75.
  - (2) One (1) 29 Frame varnish dip system, identified as Unit 02, installed in 1967, with a maximum capacity of six-hundred and eighty-six (686) units per hour, exhausting to stacks P28, P29, P30 and P31.
  - (3) One (1) Tybond wash and phosphatizing spray system, identified as Unit 03, installed in 1971, with a maximum capacity of one-thousand three-hundred and forty-two (1,342) units per hour, exhausting to stacks P5, P6 and P7.
- (b) Two (2) Crystal Clean degreasers, identified as F10 and F11, with a maximum usage rate of 1.7 pounds per hour solvent each, installed in 1998.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Rotor Blue manual protective coating process, exhausting internally.
- (2) One (1) 29 Frame motor shell touch-up paint spray booth, using spray cans, exhausting to stack P15.
- (3) Two (2) die casting machines with a total maximum throughput of 44 pounds per hour aluminum and 0.3 pounds per hour of die release lubricant, each machine utilizing a natural gas-fired furnace rated at 0.3 MMBtu per hour each to melt aluminum, with the casting machines venting through stacks P3, P3A, P4, and P4A.

- (4) One (1) Wellman electrically heated annealing oven, and an exalene generator rated at 0.78 MMBtu per hour, with emissions released during the oven door opening cycle. Emissions released after opening exhaust through roof openings GV1, GV2, P51A, P51B, and P52.
- (5) One (1) natural gas-fired pyrolysis oven, rated at 0.3 MMBtu per hour, exhausting at stack P11.
- (6) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute.
- (7) Natural gas-fired combustion sources with heat input equal to or less than ten million British thermal units per hour (10 MMBtu/hr).
- (8) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million British thermal units per hour (6 MMBtu/hr).
- (9) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (10) VOC and HAP vessels storing lubricants oils, hydraulic oils, machining oils, and machining fluids.
- (11) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (12) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (13) Equipment related to manufacturing activities not resulting in the emission of HAPs, such as brazing equipment, cutting torches, soldering equipment, welding equipment.
- (14) Operations using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (15) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (16) Quenching operations used with heat treating processes.
- (17) Replacement or repair of bags in baghouses and filters in other air filtration equipment.
- (18) Paved and unpaved roads and parking lots with public access.
- (19) Asbestos abatement projects regulated by 326 IAC 14-10.
- (20) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (21) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (22) On-site fire and emergency response training approved by the department.
- (23) Stationary fire pumps.

### Existing Approvals

The source has been operating under the following approvals:

- (1) OP 62-06-93-0094, issued October 24, 1989;
- (2) Registered Construction and Operation Status CP 123-2673, issued August 28, 1992;

- (3) Registered Construction and Operation Status CP 123-2748, issued March 31, 1993;
- (4) Exempt Construction and Operation Status Permit No.123-3554, issued March 21, 1994; and
- (5) Registered Construction and Operation Status # 123-9846-00006, issued July 8, 1998.

The Technical Support Document for Registration 123-9846-00006, issued July 8, 1998, stated that it covered the new source review for Unit F11. At that time, Unit F10 was considered as having been reviewed under OP 62-06-93-0094, issued October 24, 1989. In the FESOP application submitted by the source on November 16, 2001, Unit F10 was listed as having been constructed in 1998. Therefore, this unit is now subject to the same requirements as F11, which are listed in the corresponding D section for the degreasing operation in the FESOP.

## Enforcement Issue

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that this FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Title V application for the purposes of this review was received on October 15, 1996. Additional information was received on October 1, 1997, and on April 11, 2000. On November 16, 2001, the source submitted a FESOP application.

## Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. The calculations are included in their FESOP application.

## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| Pollutant       | Unrestricted Potential Emissions (tons/yr) |
|-----------------|--------------------------------------------|
| PM              | less than 100                              |
| PM-10           | less than 100                              |
| SO <sub>2</sub> | less than 100                              |
| <b>VOC</b>      | <b>greater than 100, less than 250</b>     |
| CO              | less than 100                              |
| NO <sub>x</sub> | less than 100                              |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's              | Unrestricted Potential Emissions (tons/yr)                     |
|--------------------|----------------------------------------------------------------|
| glycol ethers      | less than 10                                                   |
| 2-butoxyethanol    | less than 10                                                   |
| formaldehyde       | less than 10                                                   |
| ethylbenzene       | less than 10                                                   |
| <b>xylene</b>      | <b>greater than 10</b>                                         |
| cumene             | less than 10                                                   |
| <b>combination</b> | <b>greater than 25</b>                                         |
| <b>TOTAL</b>       | <b>single greater than 10, and combination greater than 25</b> |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/emission unit                                                                                     | Potential to Emit After Issuance (tons/year) |       |                 |                |     |                 |                                           |
|-----------------------------------------------------------------------------------------------------------|----------------------------------------------|-------|-----------------|----------------|-----|-----------------|-------------------------------------------|
|                                                                                                           | PM                                           | PM-10 | SO <sub>2</sub> | VOC            | CO  | NO <sub>x</sub> | HAPs                                      |
| Surface Coating (Units 01, 02, 03)                                                                        | 13.17                                        | 0.2   | 0.2             | less than 90.0 | 2.2 | 2.6             | 9.0 single or 23.0 combination            |
| Degreasing (Units F10, F11)                                                                               | -                                            | -     | -               | less than 5    | -   | -               | -                                         |
| Insignificant Activities                                                                                  |                                              |       |                 |                |     |                 |                                           |
| Grinding and machining operations                                                                         | *                                            | *     | -               | -              | -   | -               | -                                         |
| Cutting torches, brazing, soldering and welding equipment                                                 | *                                            | *     | *               | 1              | *   | *               | -                                         |
| Rotor Blue manual protective coating process                                                              | -                                            | -     | -               | 0.5            | -   | -               | 0.5 single or 1.0 combination             |
| One (1) 29 Frame Motor Shell touch-up paint spray booth                                                   | -                                            | -     | -               | 0.5            | -   | -               | 0.5 single or 1.0 combination             |
| Two (2) die casting machines, each with a natural gas-fired furnace rated at 0.3 MMBtu/hr                 | -                                            | -     | -               | 1              | -   | -               | -                                         |
| One (1) Wellman electrically heated annealing oven, and an exalene generator rated at 0.78 MMBtu per hour | *                                            | *     | -               | -              | *   | -               | -                                         |
| One (1) natural gas-fired pyrolysis oven, rated at 0.3 MMBtu per hour                                     | *                                            | *     | *               | 1              | *   | *               | -                                         |
| Total PTE After Issuance                                                                                  | 13.17                                        | 0.2   | 0.2             | less than 100  | 2.2 | 2.6             | less than 10.0 single or 25.0 combination |

- If a unit does not emit a criteria pollutant, a hyphen is placed in the box.

\* The source has insignificant activities that emit VOC and HAPs. Because the potential to emit of other criteria pollutants at the source fall considerably below 100 tons per year, it was not necessary to address them on this table. Each insignificant activity that has the potential to emit VOC and HAPs is given a limit which is higher than their potential to emit.

This source, otherwise required to obtain a Title V operating permit, requested a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source is being issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8. The source shall comply with the requirements of 326 IAC 2-8, FESOP.

The source has potential VOC emissions of greater than 100 tons per year, and potential HAP emissions of greater than 10 tons per year for a single HAP, and greater than 25 tons per year for any combination of HAPs. Therefore, the source is limited to less than 100 tons per year of VOC, less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs.

### County Attainment Status

The source is located in Perry County.

| Pollutant       | Status     |
|-----------------|------------|
| PM              | attainment |
| PM-10           | attainment |
| SO <sub>2</sub> | attainment |
| NO <sub>2</sub> | attainment |
| Ozone           | attainment |
| CO              | attainment |

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Perry County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) 40 CFR 60 applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source. National Emission Standards for Halogenated Solvent Cleaning 326 IAC 14 & 40 CFR 63, Subpart T does not apply to the degreasing operations because the solvent does not contain methylene chloride, perchloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents, as a cleaning agent.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21, this source is a minor source. Therefore, any changes or modifications which will increase the potential to emit of VOCs to 100 tons per year or greater shall require prior approval by the IDEM, OAQ.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 2-8 (Overall Source Limit)

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act. Therefore, pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the entire source's potential to emit does not exceed the above specified limits.

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-8-4 (Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) Limits)

- (a) The volatile organic compounds (VOCs) delivered to Units 01, 02 and 03 shall not exceed ninety (90) tons per twelve (12) consecutive month period. This limit, in conjunction with the VOC limits of the other units at the source, will limit the entire source VOC emissions to less than one hundred (100) tons per year making the requirements of 326 IAC 2-7 not applicable.
- (b) An individual HAP delivered to Units 01 and 02 shall not exceed nine (9) tons per twelve (12) consecutive month period.
- (c) The combination of HAPs delivered to Units 01 and 02 shall not exceed twenty-three (23) tons per twelve (12) consecutive month period.

These limits, in conjunction with the VOC and HAPs from the insignificant units at the source, will limit the entire source VOC and HAP emissions to less than one hundred (100) tons per year of VOC, less than ten (10) tons per year for a single HAP, and less than twenty-five (25) tons per year for a combination of HAPs, making the requirements of 326 IAC 2-7 not applicable.

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the PM from Unit 03 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

Although Unit 01 was constructed in 1981, it is not subject to 326 IAC 8-2-9 since potential emissions from this unit are not greater than or equal to 25 tons per year of VOC. Units 02 and 03 are exempt from this rule based on their year of construction at the source.

As a result, the VOC emissions from Unit 01 shall be limited to less than twenty-five (25) tons per year making the requirements of 326 IAC 8-2-9 not applicable. The source shall demonstrate compliance with this limit by keeping VOC usage records for Unit 01.

#### 326 IAC 8-6 (Organic Solvent Limitations)

The requirements of this rule are not applicable because of the FESOP limitation of less than 90.0 tons per year of VOC emissions.

### Degreasers

#### 326 IAC 2-8-4 (Volatile Organic Compounds (VOC) Limit)

The volatile organic compounds (VOCs) content usage for units F10 and F11 shall not exceed 5.0 tons per twelve (12) consecutive month period. This limit, in conjunction with the VOC limits of the other units at the source, will limit the entire source VOC emissions to less than one hundred (100) tons per year making the requirements of 326 IAC 2-7 not applicable.

#### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), parts (a) and (b), the owner or operator of a cold cleaner degreaser facility (F10 and F11) construction of which commenced after July 1, 1990, shall ensure that the control equipment requirements are met as required by this rule.

The source complies with the requirements of 326 IAC 8-3-5 based on the type of degreaser they utilize.

### Insignificant Activities

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the grinding and machining operations and manufacturing activities such as brazing equipment, cutting torches, soldering equipment, and welding equipment, the Frame touch-up manual spray booth, and the Die casting process shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### Volatile Organic Compounds (VOC)

Pursuant to Exemption 123-3554-00006, issued March 21, 1994, any change or modification which may increase the potential to emissions to fifteen (15) pounds of volatile organic compounds per day or more from the Frame Motor Shell touch-up paint spray booth, must be approved by the Office of Air Quality before such a change may occur.

### Testing Requirements

No emission units at this source have ongoing testing requirements. The emissions from the surface coating operation and the degreasers are based on the material usage and MSDS for each material.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) For the surface coating operations using spraying as the method of operation:
  - (1) Weekly observations shall be made of the overspray from the surface coating booth stacks (P5, P6, P7) while Unit 03 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result

in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

## **Conclusion**

The operation of this stationary electric motors manufacturing plant shall be subject to the conditions of the attached proposed FESOP 123-6903-00006.